

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**JESSICA GUERRIERO, on behalf of
herself and all others similarly situated,**

Plaintiff,

V.

PENN NATIONAL GAMING, INC., et al.

Defendants.

CASE NO. 4:21-cv-01917

JUDGE BENITA Y. PEARSON

**MOTION FOR ADMISSION *PRO HAC VICE*
OF ATTORNEY DENISE DRAKE**

Pursuant to Local Rule 83.5(h) of the Rules of the United States District Court for the Northern District of Ohio, Defendants Penn National Gaming, Inc., Central Ohio Gaming Ventures, LLC d/b/a Hollywood Casino Columbus, Dayton Real Estate Ventures, LLC d/b/a Hollywood Gaming at Dayton Raceway, Toledo Gaming Ventures, LLC d/b/a Hollywood Casino Toledo, and Youngstown Real Estate Ventures, LLC d/b/a Hollywood Casino at Mahoning Valley Race Course, move this Court to grant leave for attorney Denise K. Drake to appear *pro hac vice* in this action on their behalf.

In support of this motion, the undersigned asserts the following:

1. Ms. Drake is an attorney with the Kansas City office of the law firm of Polsinelli PC, which is located at 900 W. 48th Place, Suite 900, Kansas City, Missouri, 64112. Her business telephone number is (816) 360-4357, and her business facsimile number is (816) 753-1536. Her email is DDrake@Polsinelli.com.

2. The declaration of Ms. Drake, which is offered in support of this Motion and contains the specific information required by Local Rule 83.5(h), is attached hereto as Exhibit A.

3. As noted in her declaration, Ms. Drake is a member in good standing of the State Bars of Missouri, Kansas, Iowa, and Nebraska. Furthermore, no disciplinary proceedings have been filed or are pending against her, and she has not been disbarred or suspended from practice before any court, department, bureau or commission of any State or the United States. As also noted, she has never received any reprimand from any such court, department, bureau or commission pertaining to conduct or fitness as a member of any bar.

4. The undersigned is tendering the required filing fee with this Motion.

WHEREFORE, Defendants respectfully request that this Court grant attorney Denise K. Drake limited admission to appear in this Court, in this particular proceeding, on their behalf.

Respectfully submitted,

/s/ Kerri L. Keller
Kerri L. Keller (0075075)
BROUSE MCDOWELL
388 South Main Street
Suite 500
Akron, OH 44311
Telephone: (330) 535-5711
Facsimile: (330) 253-8601
kkeller@brouse.com

/s/ Christopher Carney
Christopher Carney (0037597)
BROUSE MCDOWELL
600 Superior Ave. E.
Suite 1600
Cleveland, OH 44114
Telephone: (216) 830-6830
Facsimile: (216) 830-6807
ccarney@brouse.com

Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 24th day of November 2021, a true and correct copy of the above and forgoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Respectfully submitted,

/s/ Kerri L. Keller
Kerri L. Keller (0075075)